

## REMARKS

Claims 1-13 and 15 are currently pending in the application. Claims 1 and 8 have been amended. Claim 14 was canceled. Reconsideration of the claims is respectfully requested.

### I. 35 U.S.C. §112, second paragraph

The Examiner has rejected claims 2, 3, 8 and 11 under 35 USC §112, second paragraph, as being indefinite for using the term “sort code” without sufficient antecedent basis in the specification. The term “sort code” is not recited in claim 8, but is recited in claim 9. Therefore, Applicant assumes the Examiner intended to reject claim 9 under §112.

The term “sort code” as used in claims 2, 3, 9 and 11 appears in paragraph 0042 of the specification. Therefore, it is respectfully asserted that there is sufficient antecedent basis for the term “sort code” in the specification to support the use of this term in claims 2, 3, 9 and 11, and the rejection of the claims under 35 USC §112 should be withdrawn.

### II. 35 U.S.C. § 103, obviousness

The Examiner has rejected claims 1-15 under 35 U.S.C. § 103(a) as being unpatentable over Williams et al. (US Publication No. 2003/0055812) in view of Honjo et al. (US Publication No. 2001/0056378) and further in view of Bailey et al. (2002/0091690). This rejection is respectfully traversed.

In rejecting the claims, the Examiner writes:

For claims 1-7 (a system) and 8-15 (a method), Williams discloses a computer system for identifying a part, the system comprising a scalable database of identification data sets [0023], each data set descriptive of an item comprising data for a numbering scheme (partID, PartAssemblyID, OEMPartNum, etc) a family category (516), picture files depicting the item (Part Img), and identification criteria (fields in product table) defined from the family category (Fig. 5), a computer-readable medium ([0022]) and a processor in communication with the computer-readable medium and the database (104 in Fig. 1). Williams also teaches that the data sets descriptive of an item further comprise data for ownership (in billboard 118), size (part/detail description in Fig. 4), sort code (status in Fig. 5), supplier ([0092]) and product line (618 in Fig 6C). A user device including the input device and the user display screen is inherently taught by Williams as being necessary requirements for user interface. Williams also discloses that the instructions are further configured to present an item screen depicting a data set for a single item [0043].

Regarding claims 1 and 8, Williams does not teach or suggest the limitation of using a data set descriptive of an item that includes a plurality of alternate numbering schemes geared toward different segments of an industry and stages of product lifecycle. The Williams invention only uses one numbering scheme in its data set for identifying each part, specifically, the industry reference number. The only other significant numbering scheme used is the OEM number. However, as explained in Williams, the OEM number is not an equivalent alternate to the industry reference number:

[0058] The OEM number column 392 contains the OEM number of the part. It may be desired to have the part renamed to contain the identifying information of the original equipment manufacturer part. For example, the OEM part may refer to a part that includes multiple subparts. This can cause of confusion in that an OEM number can refer either to one specific part or to an overall assembly which may, or may not, contain parts with their own OEM numbers. As such, an industry reference number column 394 is also provided. For example a bumper contains many individual parts such as front and/or back sections, springs, protective covering, etc., each of which has been assigned a distinctly different industry reference number. All of the part numbers for these subparts and assemblies can be accessed by selecting the industry reference number icon. When clicked on, this icon provides a popup window displaying all of the industry reference numbers pertaining to that particular part.

The alternate number schemes of the present invention are explained in paragraph 0033 of the pending specification:

[0033] The look-up screen presents a plurality of input boxes 62 based upon one of several different numbering systems used in the automotive industry, including blocks for UPC Code 64, Service Part Number 66, Motorcraft® Part Number 68, Engineering Part Number 70. Each numbering system is geared toward a particular segment of the automotive industry and/or stage of the product lifecycle. As an example, The Motorcraft® Part Number may be used by the for aftermarket parts used in automobiles from Ford Motor Co., Inc. The Engineering Part Number is used by the engineering group of an automobile manufacturer. Parts can be identified by make and model of the vehicle using the Prefix, Base and Suffix numbering system.

Williams does not provide this ability to cross reference a given part using different numbering schemes, depending upon the one with which the user is most familiar. Williams relies on the industry reference numbering scheme and the OEM number. However, as explained above,

the OEM is not an equivalent to the industry reference number and may include multiple parts, not just the one the user is attempting to identify, making alternative identification difficult.

Similarly, Honjo teaches identifying parts according to a part code assigned by the service provider that manufactures the parts. A user may subsequently create an independent control number for managing the user's inventory of parts. However, this is an optional user defined criteria and not equivalent to the claimed invention's use of a plurality of alternate numbering schemes geared toward different segments of an industry and stages of product lifecycle.

Bailey teaches a method for searching for a part using an identifying alphanumeric string and displaying attributes of the part to the user. Some embodiments of the Bailey invention allow the user to conduct a search without knowing specific formatting and syntax requirements for the system, enabling the search to continue in spite of mistakes in the alphanumeric string entered by the user. Again, there is no teaching or suggestion of using a plurality of alternate numbering schemes geared toward different segments of an industry and stages of product lifecycle.

Because claims 2-7, 9-13 and 15 depend from claims 1 and 8, respectively, they are distinguished from Williams, Honjo and Bailey for the reasons explained above.

Therefore, it is respectfully urged that the rejection of claims 1-13 and 15 under 35 U.S.C. § 103 has been overcome and should be withdrawn.

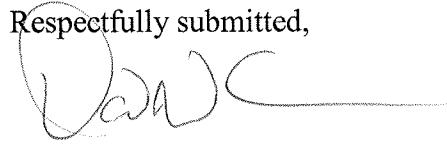
**Conclusion**

It is respectfully submitted that the claims are now in condition for allowance and are patentable over the cited prior art reference.

A first Office Action on the merits is now respectfully awaited. If there are any outstanding issues that the Examiner feels may be resolved by way of a telephone conference, the Examiner is cordially invited to contact David W. Carstens at 972.367.2001.

Date: March 12, 2007

Respectfully submitted,



---

David W. Carstens  
Registration No. 34,134  
CARSTENS & CAHOON, LLP  
PO Box 802334  
Dallas, TX 75380  
(972) 367-2001 *Telephone*  
(972) 367-2002 *Facsimile*